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9/15/10



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

SEP 15 2010

OFFICE OF  
AIR, WASTE AND  
TOXICS

Mr. Peter Jewitt  
Farallon Consulting, LLC  
975 5<sup>th</sup> Avenue Northwest  
Issaquah, Washington 98027

Mr. Gil Leon  
Earle M. Jorgensen Company  
10650 South Alameda  
Lynwood, California 90262

Re: Request for Extension – Submittal of Second Draft Engineering Evaluation/Cost Analysis; Jorgensen Forge Facility, Seattle, Washington  
Administrative Order on Consent, U.S. EPA Docket No. CERCLA 10-2003-0111

Dear Mr. Jewitt and Mr. Leon:

The U.S. Environmental Protection Agency Region 10 (EPA) received an email on September 9, 2010 from your project manager, Amy Essig Desai, requesting a second extension of the due date for the revised Draft Engineering Evaluation/Cost Analysis (EE/CA) for the Jorgensen Forge Facility. The email indicates that you are not comfortable revising the EE/CA until you have seen 30% engineering drawings for the proposed remedy at Boeing Plant 2 with "enough buy off from EPA that it would closely represent what EPA would take to public comment." The current due date for submitting your revised EE/CA to EPA is September 20, 2010. The email requests an additional six-week extension until November 1, 2010, and requests a meeting be held between EPA, Jorgensen, and Boeing in order to develop a revised project schedule.

As you are aware, the project schedule allows very little time beyond September 20<sup>th</sup> for submittal of the EE/CA if construction is to begin in 2012. Your proposed submittal date may negatively impact the construction start date. EPA is committed to achieving the 2012 construction season, and is concerned that an extension will reduce the likelihood.

EPA is also concerned that Jorgensen appears to expect EPA to "buy off" on a proposed remedy prior to receipt of the alternatives analyses for both the Jorgensen and Boeing Plant 2 cleanups. As you are aware, EPA must consult with tribal governments and the Washington State Department of Ecology, and intends to consult with other stakeholders, prior to sending a proposed remedy to public comment. While we understand your desire for some certainty prior to submitting the EE/CA, EPA provided

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direction and guidance in the form of comments on your EE/CA as well as Boeing Plant 2's alternatives analysis, and coordinated these comments to avoid inconsistencies.

In accordance with comments already provided to you, the EE/CA must evaluate several reasonable alternatives for cleanup of the conditions that exist at the Jorgensen Forge site. Boeing must do the same for the Plant 2 cleanup. While the selected remedies must be consistent to a significant degree, and fully integrated within the transition zone, the alternatives in the EE/CA are broad enough to support EPA remedy selection for Jorgensen regardless of what is ultimately selected for Boeing Plant 2.

We have had several technical meetings to discuss EPA's comments on Jorgensen's EE/CA, and believe we are in agreement about what alternatives will be evaluated. EPA does not expect there will be major inconsistencies in conceptual approach, and minor inconsistencies can be coordinated during final design. We do not see any advantage in proceeding serially rather than in parallel with the Boeing Plant 2 and Jorgensen alternatives analyses.

EPA is therefore granting only a partial extension to the submittal date, to allow a reasonable period of time to complete a high-quality revised EE/CA for the Jorgensen Forge site. The revised EE/CA should be coordinated to the degree possible with Boeing given the time constraints. Jorgensen Forge's revised draft Engineering Evaluation/Cost Analysis must be submitted to EPA by October 12, 2010.

Should you have questions or comments, please contact me by phone at 206-553-8506 or by email at [brown.christy@epa.gov](mailto:brown.christy@epa.gov).

Sincerely,



Christy Brown  
Project Coordinator  
Office of Air, Waste and Toxics

Cc: Glen St. Amant, Muckleshoot Tribe  
Allison O'Sullivan, Suquamish Tribe  
Marla Steinhoff, NOAA  
John Keeling, Ecology - NWRO  
Brad Helland, Ecology - NWRO  
Thea Levkovitz, DRCC  
Amy Essig Desai, Farallon Consulting  
David Templeton, Anchor Environmental  
Ryan Barth, Anchor Environmental  
John S. Wakeman, USACE

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Peter Jewitt

Farallon Consulting, LLC

975 5th Avenue, Northwest

Issaquah, WA 98027

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PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047



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**US Environmental Protection Agency  
Office of Air, Waste & Toxics-AWT-107  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101  
Attn: Sharon Darco**





## Region 10 Routing and Concurrence

Author:	Christy Brown	Date:	9-14-10
Addressee:	Peter Jewitt, Farallon Consulting; Gil Leon, Earle M. Jorgensen Company		
Subject:	Schedule Extension for Draft EE/CA		
File Location/Name:	Superfund Records Center; LDWG 4.1/Jorgensen Forge		

### PROGRAM ADMIN REVIEW:

Name:	BROWN	ORDINE	POLICY FILE YES/NO	RCRAINFO YES/NO
Initials/Date:	CAB 9-14-10			

### PROGRAM OFFICE CONCURRENCE:

Name:	ARRIGONI	BLOCKER	CASTRILLI	FISHER	HEDEEN	PALUMBO	MEYER
Initials/Date:		SB 9/14/10		CF 9/14/10			

### RA OFFICE CONCURRENCE/SIGNATURE:

Name:						
Initials/Date:						

**cc(s)** (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

<b>Glen St. Amant</b> Senior Sediment Specialist Muckleshoot Indian Tribe 39015 172 <sup>nd</sup> Ave SE Auburn, WA 98092	<b>Marla Steinhoff</b> NOAA Assessment and Restoration 7600 Sand Point Way NE, Building 1 (DARP) Seattle, WA 98155	<b>Brad Helland</b> Department of Ecology, NWRO 3190 - 160 <sup>th</sup> Ave, SE Bellevue, WA 98008-5452
<b>Allison O'Sullivan</b> Suquamish Tribe P.O. Box 498 Suquamish, WA 98392	<b>John Keeling</b> Department of Ecology, NWRO 3190 - 160 <sup>th</sup> Ave, SE Bellevue, WA 98008-5452	SEE ATTACHED

**bcc(s)** (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

<b>Charles Ordine, ORC-158</b> <b>Allison Hiltner, ECL-111</b> <b>Kris Flint, ECL-111</b> <b>Piper Peterson-Lee, ECL-111</b>	<b>Suzanne Skadowski, ETPA-081</b> <b>Erika Hoffman, WOO</b> <b>Shawn Blocker, AWT-121</b> <b>Christy Brown, AWT-121</b>	9/23/10
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Mailing Deadline:	9-15-10	Certified Mail:	original only
FAX to:		FAX #:	

#### ADDITIONAL INFO/INSTRUCTIONS:

Please email pdf to Amy Essig Desai at "Amy Essig Desai" aedesai@farallonconsulting.com ASAP!

Please attach Superfund Records Center routing slip to file copy & route to ECL-076. Thanks!

Filing Instructions:			
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CCs, continued:

Thea Levkovitz

DRCC

5410 1<sup>st</sup> Ave NE

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